

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Regulatory Commission
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MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE
CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF WITNESS PAUL HOGROGIAN (NPMHU-T2)
TO UNITED STATES POSTAL SERVICE
FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
NATIONAL POSTAL MAIL HANDLERS UNION WITNESS HOGROGIAN
(USPS/NPMHU-T2-4) ERRATA
(June 7, 2012)**

Attached to this cover page is a revised response of witness Paul Hogrogian (NPMHU-T2) to the Interrogatories of the United States Postal Service (USPS/NPMHU-T2-1-8) filed May 23, 2012. The original filing inadvertently omitted the page header. This filing replaces only USPS/NPMHU-T2-4.

Respectfully submitted,

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As agent for and authorized by
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June 7, 2012

RESPONSES OF NPMHU WITNESS HOGROGIAN TO
POSTAL SERVICE INTERROGATORIES

USPS/NPMHU-T2-4: On page 3, lines 11 through 14 of your testimony, you state:

In addition, even the Postal Service concedes that it cannot close the Staten Island facility, as it will need this facility to conduct its collection consolidation prior to transfer to Brooklyn, dock transfer the mail processed in Brooklyn to the corresponding 14 stations, and maintain the Registry and Express operations in Staten Island (see pages 4-5 of AMP).

Please identify with specificity, the language on pages 4-5 of the Staten Island P&DF AMP Study that supports this statement.

RESPONSE:

See the following language from the Staten Island P&DF AMP at page 4: “Due to logistics and to protect service, a reduced mail processing operation will remain in Staten Island P&DF. Staten Island current collection consolidation will remain in the building and be sent to Brooklyn P&DC for processing. Staten Island P&DF will serve as a hub to receive in the morning all mail processed in Brooklyn P&DC and dock transfer to the corresponding 14 stations. In addition, Registry and Incoming/Outgoing Express and New Jersey Network Distribution Center respectively will be send [sic] to Staten Island P&DF for dock transfer to the station. . . . Staten Island P&DF current transportation schedules will remain, as all 14 stations will be served out of this building. A total of six (6) clerks, seventeen (17) mail handlers and one (1) Supervisor Distribution Operations will remain under Finance Number 35-8172 to support the Function 1 operations.”

See also from the AMP at page 5: “A hub and spoke concept at the Staten Island P&DF is being proposed.”